

Karl S. Kronenberger (CA Bar No. 226112)
KRONENBERGER ROSENFELD, LLP
548 Market Street, #85399
San Francisco, CA 94104
Telephone: (415) 955-1155
E-Mail: Karl@kr.law

David C. Silver (*pro hac vice* - DE 11)
Eric F. Rosenberg (*pro hac vice* - DE 12)
SILVER MILLER
4450 NW 126th Avenue - Suite 101
Coral Springs, Florida 33065
Telephone: (954) 516-6000
E-Mail: DSilver@SilverMillerLaw.com
E-Mail: ERosenberg@SilverMillerLaw.com

Attorneys for Plaintiffs Lawrence Liu and Ling-Ling Liu

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAWRENCE LIU, an individual; and
LING-LING LIU, an individual;

Plaintiffs,

v.

THE CHARLES SCHWAB CORPORATION, a
Delaware corporation;
CHARLES SCHWAB BANK, SSB, a Texas-
chartered state savings bank;
BANK OF AMERICA, N.A., a national banking
association; and
UNCHAINED TRADING, LLC, a Texas limited
liability company;

Defendants.

Case No. 4:24-cv-07400-HSG

**JOINT STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS TO
FILE AMENDED COMPLAINT**

Judge: Hon. Haywood S. Gilliam, Jr.

Pursuant to Federal Rule of Civil Procedure 15(b) and Civil Local Rules 6-1(b) and 6-2, Plaintiffs Lawrence Liu and Ling-Ling Liu (“Plaintiffs”) and Defendant Bank of America, N.A. (“Defendant”), by and through their undersigned counsel of record, hereby stipulate as follows:

1. The Complaint in this matter was filed on October 23, 2024. [Dkt. 1].
2. On January 10, 2025, Defendant filed a Motion to Dismiss the Complaint [Dkt. 32].
3. On September 18, 2025, the Court entered an Order granting without prejudice Defendant’s Motion to Dismiss the Complaint (the “Order”). [Dkt. 42].
4. Pursuant to the Order, Plaintiffs were granted permission by the Court to file an Amended Complaint. The deadline set by the Court for Plaintiffs to file their Amended Complaint is October 9, 2025.
5. Due to the press of business unrelated to the instant matter, undersigned counsel for Plaintiffs requested in good faith Defendant’s consent on a brief two-week enlargement of the October 9, 2025 deadline to file the Amended Complaint.
6. Defendant’s counsel represented to Plaintiffs’ counsel that Defendant has no objection to the requested two-week enlargement of the filing deadline, provided that Defendant be afforded a two-week extension of its deadline to respond to the Amended Complaint (thus affording Defendant 28 days, instead of 14 days, to respond to the Amended Complaint).
7. The parties have not previously requested that any other deadlines set forth in the Order be extended.
8. Moreover, the Parties do not enter into this Stipulation for the purpose of delay.
9. No party will be prejudiced by the stipulated-to extensions.
10. In entering into this stipulation, Defendant does not waive any objection or defense to the Amended Complaint.

NOW THEREFORE, the Parties hereby agree that the time for Plaintiffs to file their Amended Complaint is extended to October 23, 2025; and the time for Defendant to file its response to the Amended Complaint is extended to November 20, 2025.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 Dated: October 7, 2025

2 By: /s/ Karl S. Kronenberger
3 Karl S. Kronenberger, Esq.
4 CA Bar No. 226112
5 **KRONENBERGER ROSENFELD, LLP**
6 548 Market Street, #85399
7 San Francisco, CA 94104
8 Telephone: (415) 955-1155
9 E-Mail: Karl@kr.law

10 David C. Silver, Esq. (*pro hac vice* - DE 11)
11 Eric F. Rosenberg, Esq. (*pro hac vice* - DE 12)
12 **SILVER MILLER**
13 4450 NW 126th Avenue - Suite 101
14 Coral Springs, Florida 33065
15 Telephone: (954) 516-6000
16 E-Mail: DSilver@SilverMillerLaw.com
17 E-Mail: ERosenberg@SilverMillerLaw.com

18 *Attorneys for Plaintiffs Lawrence Liu*
19 *and Ling-Ling Liu*

By: /s/ Noah A. Levine
Michael Mugmon, Esq.
**WILMER CUTLER PICKERING HALE
AND DORR LLP**
1 Front Street - Suite 3500
San Francisco, CA 94111
Telephone: (628) 235-1000
E-mail: michael.mugmon@wilmerhale.com

Noah A. Levine, Esq. (*pro hac vice* - DE 27)
Marissa M. Wenzel, Esq. (*pro hac vice* - DE 28)
Michael McGuinness, Esq. (*pro hac vice* - DE
37)

**WILMER CUTLER PICKERING HALE
AND DORR LLP**
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: (212) 230-8800
E-mail: noah.levine@wilmerhale.com
E-mail: marissa.wenzel@wilmerhale.com
E-mail: mike.mcguinness@wilmerhale.com

Attorneys for Defendant Bank of America, N.A.

16 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(h)(3)**

17 I, Karl S. Kronenberger, am the ECF User whose ID and password are being used to file this
18 JOINT STIPULATION AND PROPOSED ORDER TO EXTEND TIME FOR PLAINTIFFS TO
19 FILE AMENDED COMPLAINT. In compliance with Civil Local Rule 5-1(h)(3), I attest that
20 concurrence in the filing of this stipulation has been obtained from all signatories.

KRONENBERGER ROSENFELD, LLP

21 DATED: October 7, 2025

By: /s/ Karl S. Kronenberger
Karl S. Kronenberger
Attorneys for Plaintiffs Lawrence Liu
and Ling-Ling Liu

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 Dated: 10/8/2025

26 
27 HONORABLE HAYWOOD S. GILLIAM, JR.
28 United States District Judge